

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

PREMIER ELECTRONICS, L.L.C., §
Plaintiff §

v. §

ADT L.L.C., §
Defendant §

CASE NO. 3:18-CV-2036-S

ADT'S PROPOSED JURY QUESTIONS

Pursuant to the Agreed Scheduling Order [ECF No. 18], Defendant ADT LLC hereby submits the following proposed questions to be submitted to the venire for completion prior to voir dire in this matter. ADT reserves the right to amend its proposed questions in light of further proceedings, as appropriate.

Dated: January 19, 2021

Respectfully submitted,

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Juror Questions

JUROR NO. _____

*In order to assist the Court and counsel, please answer each of the following questions without consulting any other person. If you fill this out by hand, **PLEASE PRINT YOUR ANSWERS.***

This questionnaire contains some questions about your ability to serve as juror in light of COVID-19 and COVID-19-related restrictions. These questions are designed to ensure that jurors will be comfortable serving and are able and willing to follow restrictions that are necessary to have a safe trial during this time.

THERE IS A POSSIBILITY YOU WILL BE SELECTED AS A JUROR. YOU ARE INSTRUCTED NOT TO RESEARCH THIS SUBJECT MATTER ONLINE OR READ, WATCH, OR LISTEN TO BROADCASTS ABOUT THIS LAWSUIT OR RELATED SUBJECT MATTER UNTIL SUCH TIME AS YOU MAY BE DISMISSED AS A POTENTIAL JUROR IN THIS CASE. NEWS REPORTS MAY BE INACCURATE OR INCOMPLETE AND MAY CONTAIN MATTERS THAT WOULD NOT BE PROPER FOR YOU TO CONSIDER AS A JUROR. YOU ARE INSTRUCTED NOT TO DISCUSS ANYTHING RELATED TO THIS LAWSUIT WITH ANYONE UNTIL I GIVE YOU FURTHER INSTRUCTIONS.

1. **Name:** _____ **Age:** _____

2. **Address:** _____ **Zip code:** _____

3. **Regarding your residence: (check all that apply)**

☐ House ☐ Apartment ☐ Rent ☐ Own ☐ Live with Homeowner

4. **Are you, an immediate family member, or some other person with whom you must have regular close contact with during the course of this trial part of a group that is at “high risk” for COVID-19 complications?**

☐ Yes ☐ No

If yes, please explain and list the particular co-morbidity or risk (e.g., diabetes, lung disease, heart disease) from which you or you close contact suffer:

5. **Would your concerns about COVID-19 prevent you from paying attention and fulfilling your duties as a juror?**

☐ Yes ☐ No

If yes, please explain: _____

6. **During this trial, the Court will impose social distancing and mask-wearing requirements at all times for the safety of all trial participants, jurors, attorneys, witnesses, and court personnel. Are you willing and able to follow these guidelines?**

☐ Yes, I am willing and able ☐ No, I am not willing and able

If no, please
explain: _____

7. **Are you:** ☐ Employed full time ☐ Employed part time ☐ Retired ☐ Unemployed ☐ Homemaker ☐ Other

Current or last occupation: _____

Current or last employer: _____

If you had other jobs during the last 10 years, please list the jobs and employers:

8. **Have you ever served in the military?** ☐ Yes ☐ No **If yes, list dates, branch, and rank:**

9. **Your current marital status:**

- ☐ Engaged ☐ Married, ____ yrs. ☐ Single, living alone
☐ Separated, ____ yrs ☐ Divorced, ____ yrs ☐ Widowed, ____ yrs
☐ Living with partner, ____ yrs

10. **Spouse/partner occupation:** _____ **Spouse/partner employer:** _____

11. **Do you have any children?** ☐ Yes ☐ No **If yes, list age and gender of each:** _____

12. **Your highest level of education completed:**

- ☐ Grade school or less (Grade: ____)
☐ High school graduate (Name of school: _____)
☐ Some college, no degree (Name of school: _____) Area of study: _____
☐ Technical or vocational (Name of school: _____) Area of study: _____
☐ Associate's degree (Name of school: _____) Major/Degree: _____
☐ Bachelor's degree (Name of school: _____) Major/Degree: _____
☐ Master's degree or Doctorate (Name of school: _____) Major/Degree: _____
☐ Other (please explain): _____

13. **Have you ever served on a jury?** ☐ Yes, civil, ____ times ☐ Yes, criminal, ____ times ☐ No

If yes:

(a) When? _____

(b) What were the cases about? _____

(c) Were you ever the foreperson? ☐ Yes ☐ No

(d) Did the jury reach a verdict in each case? ☐ Yes ☐ No

14. **Have you been an officer or held a leadership position in any organizations?** ☐ Yes ☐ No

If yes, please describe briefly: _____

15. **What are your and your family's favorite hobbies or pastimes?** _____

16. **What radio, TV, or news programs do you regularly listen to and/or watch?** _____

17. **Do you use any of the following social media:** ☐ Facebook ☐ LinkedIn ☐ Twitter ☐ Instagram ☐ Parler

☐ Gab ☐ Reddit ☐ TikTok ☐ YouTube ☐ Other: _____

18. **Do you, or does anyone close to you, have experience, education, or training in the legal field?**

☐ Yes, self ☐ Yes, someone else ☐ No

19. Do you or a member of your immediate family subscribe to alarm monitoring services?

☐ Yes ☐ No ☐ I have in the past, but not currently

20. Without hearing any evidence, do you have an opinion about the residential alarm monitoring providers?

☐ Yes ☐ No

If yes, what are your opinions? _____

21. From what you have experienced, heard, or read, have you formed any impressions or opinions about large corporations? ☐ Favorable ☐ Neutral ☐ Unfavorable

Please explain: _____

22. From what you have heard or read, do you think that the money damages awarded by juries in recent lawsuits have generally been: ☐ Too high ☐ About right ☐ Too low

23. Please indicate how you feel about each of the following statements.

a. Large corporations are often sued just because they have "deep pockets."

i. Agree ☐ Disagree ☐

b. It is common that people who cause their own problems will try to blame their problems on a someone or something else.

i. Agree ☐ Disagree ☐

c. People who sue others should have limits on what amount of money they can get.

i. Agree ☐ Disagree ☐

24. Have you or anyone close to you ever been involved in a lawsuit?

a. Yes ☐ No ☐

b. If yes, were you the

i. Plaintiff ☐ Defendant ☐

c. Please describe what the case was about: _____

25. Do you or anyone in your immediate family own their own business?

a. Yes ☐ No ☐

i. If yes, please describe the business:

All of these answers are true and correct.

Signature: _____